



INTERNET SECURITY ALLIANCE

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February 12, 2013

The Honorable Mike Rogers
U.S. House of Representatives
Washington, DC 20515

The Honorable C.A. Dutch Ruppertsberger
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Rogers and Ranking Member Ruppertsberger:

The Internet Security Alliance (ISA) would like to commend you both for your continued cyber security leadership in re-introducing the "Cyber Intelligence Sharing and Protection Act" (CISPA). As you may recall, the ISA proudly supported this legislation in the last Congress and we will continue our support when it is re-introduced in this new, 113th Congress.

ISA's continued support stems from the fact that this legislation, rather than utilize a traditional, top-down regulatory approach that is too limited in scope and too slow to keep pace with ever-changing cyber threats, employs an approach that ISA has historically advocated for in its Cyber Security "Social Contract" and other policy statements: namely, the harnessing of market-based incentives to motivate voluntary cyber security enhancements. More specifically, the "Cyber Intelligence Sharing and Protection Act" enables entities to voluntarily share cyber threat information, in good faith, in exchange for certain, targeted liability protections; tailored antitrust and FOIA exemptions; and limitations on this information's usage by both private sector entities and the government. Indeed, with the better deployment of market incentives, as is done in your legislation, a truly sustainable system of cyber security can be created that can not only make us more secure, but that is also cost feasible and economically viable.

Moreover, this voluntary, incentive based approach, advocated for by ISA, utilized in CISPA, and endorsed by a bipartisan House majority with its past passage of CISPA, can be applied to various, other cyber security enhancing measures, such as broader adoption of best practices, standards and improved enterprise risk management. Additional forms of market incentives, such as procurement advantaging, streamlined regulation and permitting, and the use of private insurance, for example, could be used as well to promote these and other society benefiting cyber security behaviors.

In advocating for CISPA and its approach, we also note that the House Republican Cyber Security Task Force embraced such an approach as well by advocating that Congress create a "menu of market incentives" to promote enhanced cyber security behavior. Indeed, even in the U.S. Senate, by the time the "Cybersecurity Act of 2012" reached the floor, it had abandoned its previous model of regulatory mandates in favor of the use of market incentives.

In sum, the ISA, which is a multi-sector trade association with membership from the aviation, banking, communications, defense, education, financial services, healthcare, insurance, manufacturing, security and technology industries, is extremely encouraged by your plans to re-introduce the "Cyber Intelligence Sharing and Protection Act" in this Congress and we look forward to working with you as the bill makes its way through the House.

Regards,

Larry Clinton
President & CEO
Internet Security Alliance